Law Office Of

MASSEY MCCLUSKY

3074 EAST ROAD MEMPHIS, TN 38128

Attorneys:
William D. Massey* †
Lorna S. McClusky
Larry M. Sargent
Claiborne H. Ferguson

Phone: 901-384-4004

E-mail addresses:
wdmdefend@aol.com
lsmdefend@aol.com
sargedefend@aol.com

Fax: 901-937-8004

July 24, 2006

Camille R. McMullen, Esq. Assistant U.S. Attorney 167 North Main Street, Suite 800 Memphis, TN 38103

Re: U.S.A. vs. Sandra Patterson

No. 06-20237-MA

Dear Ms. McMullen,

Pursuant to Rule 16 of all the Federal Rules of Criminal Procedure, Defendant hereby requests copies of all items discoverable under subparagraphs (a)(1)(A) through (a)(1)(E).

Defendant also requests written notice, ten days in advance of trial, of the government's intention to use any like and similar conduct on the part of the Defendant should this case proceed to Trial.

Defendant requests notice of any items seized by agents of the United States or a State Government agency from the person or property of the Defendant, which may or could be the subject of a Motion to Suppress Evidence as per Rule 12 (d)(2).

Defendant requests notice of the use of any electronic surveillance or wiretap in this case.

Finally, Defendant requests that the government provide the Defendant with any evidence that would tend to exculpate or show in a favorable light the Defendant or mitigate the punishment.

Sincerely,

s/Lorna S. McClusky

Lorna S. McClusky For the Firm